REMARKS

Claims 3, 6-10, 15-17, and 19-29 are pending in the application and stand rejected.

Objection to the Specification

Applicants thank the Examiner for noting the erroneous citation in their previous amendment to the specification, and pursuant to the Examiner's request hereby re-submit their earlier amendments to the specification, citing to the correct portion of the specification.

Objection to the Drawings

The Examiner objects that Figure 10 shows element 1002, which is not mentioned in the specification. Applicants note that the specification erroneously referred to element 1102, which has presently been addressed via amendment to page 30, line 26 of the specification to refer to element 1002.

Rejection under 35 U.S.C §102

Claims 8 and 25 stand rejected under 35 U.S.C. 102(b) as being anticipated by U.S. Patent No. 5,825,879 to Davis. In particular, the Examiner finds that, with regard to claim 25, Davis discloses all of the claimed limitations. Applicants have reviewed the reference with care, paying particular attention to the passages cited, and are compelled to respectfully disagree with the Examiner's characterization of this reference. However, in the interest of cooperation and solely to ease the passage of this case to allowance, Applicants hereby present further amendments to claim 25 to make even clearer the novel and patentable differences between the claimed invention and Davis.

Specifically, claim 25 has been amended to recite that the trusted component is physically and logically protected to provide verification of the integrity of the platform to a user upon user request. Support for this amendment may be found in the originally filed specification at, *inter alia*, page 19 and on in the discussion of the embodiment of Fig. 5. Applicants submit that there

is nothing in any of the prior art on record in the case that anticipates or obviates a trusted component that is physically and logically protected to provide verification of the integrity of the platform to a user upon user request. Davis, for instance, mentions nothing of a logically protected trusted component, much less one able to provide verification of the integrity of the platform to a user upon user request. In fact Davis makes clear, especially in the portion at col. 4 ll. 32-48 cited by the Examiner, that only <u>physical</u> - not logical - tamper barriers are contemplated.

In view of the above, Applicants respectfully submit that claim 25 is in fact patentable over Davis and request the Examiner to kindly reconsider and pass this claim as well as dependent claim 28 to issue.

Claims 26 and 29 stand rejected under 35 U.S.C. 102(b) as being anticipated by WIPO Patent Publication No. 98/44402 to Bramhill et al. Applicants respectfully disagree.

The Examiner cites to various portions of Bramhill as allegedly disclosing "a server that securely send data to an authenticated client" and explains that "[t]he authentication of the token may involve the use of a token sent to the client to verify that the client has permission and has not been tampered, ensuring that the client restricts the sue of the data ... before it is sent." This generalized discussion of Bramhill overlooks a few very important limitations of Applicants' claims. In particular, there is no mention whatsoever in Bramhill of anything that could possibly be understood by a skilled person to read upon the claimed trusted component of a client platform, nor a trusted component having a display controller such that display of the data from the server is controlled from within the client trusted component. At best, Bramhill discloses that the client machine runs a Java-enabled browser that has the right mouse buttons disabled for a region displaying a particular image (i.e. the well know "save as", etc.). A Java-enabled browser is certainly not a trusted component having a display controller such that display of the data from the server is controlled from within the client trusted component – should the Examiner disagree, he is respectfully invited to make his case by citing to prior art specifically supporting his position.

Furthermore, because there is no trusted component disclosed in Bramhill, there obviously is no discussion of authenticating a trusted component. The discussion cited by the

Examiner simply discuses authenticating the client machine through one of a number of well-known on-line payment schemes. As the Examiner will appreciate, authenticating a trusted component of a client machine is a much more sophisticated and complex approach that offers a greater degree of trust on the part of the server, as a compromised machine could still be authenticated within the system of Bramhill whereas a machine according to Applicants'' invention that has been tampered with would be rendered nonfunctional by its trusted component.

In view of the above, Applicants respectfully submit that independent claims 26 and 29 are in fact patentable over Bramhill and request the Examiner to kindly reconsider and pass these claims to issue as well.

Claims 6-10 and 16 depend from claim 25, claim 27 depends from claim 26, and claims 19-24 depend from claim 29. In view of the above discussion, it is submitted that claims 25, 26, and 29 are allowable, and for this reason claims 6-10, 19-24 and 27 are also allowable at least based on their dependencies.

Rejection under 35 U.S.C §103

Claims 3, 6, 9, 15-17, 19-22, 25, 28 and 29 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Bramhill in view of Davis. Claims 7 and 27 stand rejected as obvious in view of Bramhill, Davis and U.S. Patent No. 6,219,788 to Flavin et al. Applicants note that the majority of these claims are dependent on claims that have been shown in the previous section to be allowable over the art on record.

With respect to claim 28, Applicants submit that the above discussion of the allowability of claims 26 and 29 is equally probative of the allowability of claim 28 because this claim also recited a trusted component of a type that is not disclosed in either of Bramhill nor Davis. To make this even clearer, claim 28 has been amended herein in the same manner as claim 25, discussed above. Applicants thus submit that amended claim 28 is also allowable over the art on record and respectfully request the Examiner to kindly pass this claim to issue as well. Claims 15

and 17 depend from claim 28, and Applicants thus submit that these claims are also allowable at least in view of their dependency.

New claim 30 is also presented herein. Claim 30 is supported by, *inter alia*, the originally field specification at page 14, lines 20-21. No new matter is presented.

In view of the above, Applicants submit that the application is now in condition for allowance and respectfully urge the Examiner to pass this case to issue.

The Commissioner is authorized to charge any additional fees which may be required or credit overpayment to deposit account no. 08-2025. In particular, if this response is not timely filed, the Commissioner is authorized to treat this response as including a petition to extend the time period pursuant to 37 CFR 1.136(a) requesting an extension of time of the number of months necessary to make this response timely filed and the petition fee due in connection therewith may be charged to deposit account no. 08-2025.

I hereby certify that this correspondence is being deposited with the United States Post Service with sufficient postage as first class mail in an envelope addressed to: Mail Stop RCE, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on

Respectfully submitted,

April 2, 2007
(Date of Transmission)

Alma Smalling
(Name of Person Transmitting)
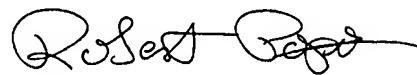
(Signature)

(Date)

Robert Popa
Attorney for Applicants
Reg. No. 43,010
LADAS & PARRY
5670 Wilshire Boulevard, Suite 2100
Los Angeles, California 90036
(323) 934-2300 voice
(323) 934-0202 facsimile
rpopa@ladasparry.com